

EXHIBIT 11

CONFIDENTIAL

Expert Report of Professor Meredith Rosenthal

March 25, 2019

II. ASSIGNMENT

6. I understand that this litigation, brought by the City of Cleveland, the City of Akron, Cuyahoga County and Summit County (collectively the “Bellwether governments”), alleges among other things that the “Defendants’ conduct in promoting opioid use, addiction, abuse, overdose and death has had severe and far-reaching public health, social services, and criminal justice consequences, including the fueling of addiction and overdose from illicit drugs such as heroin.”¹⁸ The governments further allege that the opioid epidemic and the need for increased services “arose from the opioid manufacturers’ deliberately deceptive marketing strategy to expand opioid use, together with the distributors’ equally deliberate efforts to evade restriction on opioid distribution.”¹⁹

7. In this Report, I refer to the manufacturers’ deceptive marketing strategy and tactics as “manufacturer misconduct.” This report does not address non-marketing misconduct.

8. My assignment is to answer the following questions framed by plaintiffs’ counsel, all to a reasonable degree of certainty in the area of healthcare economics and econometrics:

- *Manufacturer substantial contribution causation.* Do you have an opinion as to whether the combined effect of the Defendant manufacturers’ promotion of prescription opioids

¹⁸ Second Amended Complaint, *In Re National Prescription Opiate Litigation*, MDL No. 2804, Case No. 17-md-2804, United States District Court for the Northern District of Ohio, Eastern Division, May 18, 2018 (hereafter Cuyahoga Complaint), ¶ 19; and Corrected Second Amended Complaint, *In Re National Prescription Opiate Litigation*, MDL No. 2804, Case No. 17-md-2804 (referring to Case No. 18-op-45090), United States District Court for the Northern District of Ohio Eastern Division, May 18, 2018 (hereafter Summit Complaint), ¶ 20. I refer to both complaints as the Complaints.

¹⁹ Cuyahoga Complaint, ¶ 3 and Summit Complaint, ¶ 3.